

**MADISON COUNTY, MONTANA**

**Instructions for using the attached Crosswalk Reference Document  
for Review and Submission of Local Mitigation Plans  
to the State Hazard Mitigation Officer and FEMA Regional Office**

Attached is a crosswalk reference document, which is based on the Final Draft Report ***State and Local Plan Interim Criteria Under the Disaster Mitigation Act of 2000***, published by FEMA HQ and dated July 11, 2002. This document was based on the *Disaster Mitigation Act of 2000* (P.L. 106-390), enacted October 30, 2000 and *44 CFR Parts 201 and 206 Interim Final Rule*, published February 26, 2002.

The purpose of the crosswalk is to provide a tool to local jurisdictions in developing and submitting Mitigation Plans under Section 322 of the Disaster Mitigation Act of 2000. The crosswalk can be used to assist local or multi-jurisdiction entities in the process of developing and reviewing Local or Multi-jurisdictional plan(s). Each Local or Multi-jurisdictional plan should be reviewed by the pertinent local jurisdictional entity prior to submitting the plan to the respective State. In addition as stated in the Interim Final Rule §201.6(d)(1) "Plans must be submitted to the State Hazard Mitigation Officer for initial review and coordination. The State will then send the plan to the appropriate FEMA Regional Office for formal review and approval." The local jurisdiction must fill out column 3 prior to submitting the plan for formal review and approval.

Tribes may submit hazard mitigation plans through their respective states or they can directly submit their plans to FEMA Region VIII. This means they can write a Local or Multi-jurisdictional Plan as a sub-grantee or they may write a Standard or Enhanced State Plan as a Grantee. When tribes are considering how they want to develop and submit their plans, they need to consider whether or not they want to be Grantees directly from FEMA or Sub-grantees through their respective states. The deciding factor would be how they want to apply for and receive Pre-disaster Mitigation Grant projects, Hazard Mitigation Grant Program projects, or Flood Mitigation Assistance projects. Interested tribes can determine this by talking with their State Hazard Mitigation Officer or their respective FEMA Regional Federal Insurance and Mitigation Administration (FIMA) Division. In any case, each tribe should review their own plans before submitting them to their state or FEMA Regional office.

Following are explanations of each column.

- Column 1 indicates on what page or pages in the *State and Local Plan Interim Criteria* document more detailed information can be found regarding the requirements.
- Column 2 references and directly quotes the *44 CFR Parts 201 and 206 Interim Final Rule*.
- Column 3 is for the tribe and/or local jurisdiction to indicate the Section or Annex and the page number(s) in their plan where the requirement is addressed.
- Column 4 provides space for State/FEMA comments and for scoring of the plan.

## Local Mitigation Plan Review and Approval Status

Local Requirement		
Local Plan Submitted to the State by: Steve Orr	Title: LEPC Chairman	Date: June 2004

State Requirement		
State Reviewer: Larry Akers	Title: SHMO, MT	Date: June 2004

FEMA Requirement		
FEMA Reviewer: KC Collins Wade Nofziger Ken Crawford	Title: Program Specialist Mitigation Specialist Mitigation Specialist	Date: September 29, 2004
Date Received in FEMA Region VIII	June 24, 2004	
Plan Not Approved		
Plan Approved	XXX	
Date Approved	October 1, 2004	

<b>Point of Contact:</b> Steve Orr	<b>Local Plan Reviewed by:</b> Larry Akers	
<b>Title:</b> LEPC Chairman	<b>Title:</b> SHMO, MT	
<b>Agency:</b> Madison County	<b>NFIP Status (Single Jurisdiction)</b>	
<b>Phone Number:</b> (406) 266-9250	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>

<b>Multi-jurisdiction:</b> <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO (If yes, list each jurisdiction below:)	<b>N/A*</b>	<b>NFIP Status (for mapped communities)</b>	
1. Madison County (NSFA – Good Standing)	<input type="checkbox"/>	Participating <input checked="" type="checkbox"/>	Non-Participating <input type="checkbox"/>
2. Virginia City (never mapped)	<input checked="" type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>
3. Town of Twin Bridges (mapped 7/3/86 – Good Standing)	<input type="checkbox"/>	Participating <input checked="" type="checkbox"/>	Non-Participating <input type="checkbox"/>
4. Town of Sheridan (mapped 9/19/75 FHBM, Good Standing)	<input type="checkbox"/>	Participating <input checked="" type="checkbox"/>	Non-Participating <input type="checkbox"/>
5. Town of Ennis (mapped 11/19/86 Good Standing)	<input type="checkbox"/>	Participating <input checked="" type="checkbox"/>	Non-Participating <input type="checkbox"/>
	<input type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>
	<input type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>
	<input type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>
	<input type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>
	<input type="checkbox"/>	Participating <input type="checkbox"/>	Non-Participating <input type="checkbox"/>

<b>Local Plan POC:</b> Please complete the information requested on this profile form. The form will be submitted with your plan to the State. Using the attached crosswalk, compare your local plan content with the criteria outlined. Please note under the column heading "Location in the Plan" the page(s) where your plan addresses/meets the criteria. Thank you.
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<b>* Not applicable for communities not mapped and/or who do not have an identified flood risk.</b>
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LOCAL HAZARD MITIGATION PLAN REVIEW – MADISON COUNTY, MT  
REGION VIII, OCTOBER 1, 2004 – PAGE 3

**LOCAL MITIGATION PLAN SUMMARY WORKSHEET**

The plan cannot be reviewed if the prerequisite is not met for a single jurisdictional plan, or prerequisites are not met for a multi-jurisdictional plan.

All mandatory criteria, except those highlighted in gray, must receive a score of “**Satisfactory**” or “**Outstanding**” for the plan to receive FEMA approval. A less than “Satisfactory” score on subsections highlighted in gray will not preclude the plan from passing. Reviewer’s comments must be provided for requirements receiving a “**Needs Improvement**” score.

**SCORING SYSTEM**

Please check one of the following for each requirement.

- U – Unsatisfactory:** The plan does not address the criteria.  
**N – Needs Improvement:** The plan addresses the criteria, but needs significant improvement. Reviewer’s comments must be provided.  
**S – Satisfactory:** The plan meets the minimum criteria. Reviewer’s comments are encouraged, but not required.  
**O – Outstanding:** The plan exceeds the minimum criteria. Reviewer’s comments are encouraged, but not required.

**Prerequisite (s) (Check Applicable Box)**

Adoption by the Local Governing Body:  
§201.6(c)(5) **OR**  
Multi-jurisdictional Plan Adoption: §201.6(c)(5)  
**AND**  
Multi-jurisdictional Participation: §201.6(a)(3)

NOT MET	MET
	X
	X
	X

**Planning Process**

Documentation of the Planning Process:  
§201.6(c)(1)

U	N	S	O
		X	

**Risk Assessment**

Identifying Hazards: §201.6(c)(2)(i)  
 Profiling Hazard Events: §201.6(c)(2)(i)  
 Assessing Vulnerability: Overview: §201.6(c)(2)(ii)  
 Assessing Vulnerability: Identifying Assets:  
§201.6(c)(2)(ii)(A)  
 Assessing Vulnerability: Estimating Potential  
Losses: §201.6(c)(2)(ii)(B)  
 Assessing Vulnerability: Analyzing Development  
Trends: §201.6(c)(2)(ii)(C)  
 Multi-jurisdictional Risk Assessment:  
§201.6(c)(2)(iii)

U	N	S	O
		X	
		X	
		X	
	X		
	X		
		X	
		X	

**Mitigation Strategy**

Local Hazard Mitigation Goals: §201.6(c)(3)(i)  
 Identification and Analysis of Mitigation Measures:  
§201.6(c)(3)(ii)  
 Implementation of Mitigation Measures:  
§201.6(c)(3)(iii)  
 Multi-jurisdictional Mitigation Strategy:  
§201.6(c)(3)(iv)

U	N	S	O
		X	
		X	
		X	
		X	

**Plan Maintenance Procedures**

Monitoring, Evaluating, and Updating the Plan:  
§201.6(c)(4)(i)  
 Implementation Through Existing Programs:  
§201.6(c)(4)(ii)  
 Continued Public Involvement: §201.6(c)(4)(iii)

U	N	S	O
		X	
		X	
		X	

**Additional State Requirements\***

Insert State Requirement  
 Insert State Requirement  
 Insert State Requirement

U	N	S	O

**LOCAL MITIGATION PLAN APPROVAL STATUS**

PLAN NOT APPROVED

PLAN APPROVED

\*States that have additional requirements can add them in the appropriate sections of the *Plan Review Criteria* or create a new section. States need then modify this worksheet to record the score for those requirements.

See Reviewer’s Comments

LOCAL HAZARD MITIGATION PLAN REVIEW - MADISON COUNTY, MT  
REGION VIII, OCTOBER 1, 2004 - PAGE 4

PLAN REVIEW CRITERIA REFERENCE  (SECTION PAGE #)	REQUIREMENT AS TAKEN FROM THE INTERIM FINAL RULE PART 201	LOCATION IN THE PLAN  (INDICATE SECTION OR ANNEX AND PAGE #)	SCORE / STATE / FEMA REVIEWER COMMENTS  <u>SCORING SYSTEM</u>  MET/NOT MET (FOR PREREQUISITE (S) ONLY)  U--UNSATISFACTORY  N--NEEDS IMPROVEMENT	S--SATISFACTORY  O--OUTSTANDING
PREREQUISITE (S)  (3-1)			<i><b>NOTE: The prerequisite, or prerequisites in the case of multi-jurisdictional plans, must be met before the plan can be approved.</b></i>	
Adoption by the Local Governing Body  (3-2)	<b>Requirement §201.6(c)(5):</b>  [The local hazard mitigation plan shall include] documentation that the plan has been formally adopted by the governing body of the jurisdiction requesting approval of the plan (e.g., City Council, County Commissioner, Tribal Council)...	Appendix 4	<b>S</b>	Resolution #39 for Madison County signed and dated December 15, 2003 is included in the appendix. In addition, an adoption resolution for a Wildfire Plan is also provided that was signed the same date of December 15, 2003, although an attest signature is not indicated.
<b>OR</b>				
<b>Multi-Jurisdictional Plan Adoption  (3-3)</b>       <b>AND</b>	<b>Requirement §201.6(c)(5):</b>  For multi-jurisdictional plans, each jurisdiction requesting approval of the plan must document that it has been formally adopted.	Appendix 4	<b>S</b>	Signed resolutions that adopt the plan are provided for Sheridan, Town of Twin Bridges, and Virginia City. A half signed resolution of adoption is included for the Town of Ennis, but still requires the mayor's signature. In order for all communities listed as seeking plan approval to be eligible under the plan, formal proof of plan adoption is required at the local or state emergency management offices. The following jurisdictions have not submitted adoption documentation: Alder, Harrison, Mountain Valley, Mountain Village, and Nevada City.
<b>Multi-Jurisdictional Planning Participation  (3-4)</b>	<b>Requirement §201.6(a)(3):</b>  Multi-jurisdictional plans (e.g., watershed plans) may be accepted, as appropriate, as	Appendix 2 – Page 2	<b>S</b>	Documentation indicating the participation in the Local Emergency Planning Committee (LPEC) for the jurisdictions of Alder, Harrison, Sheridan, Twin Bridges, Ennis, and Virginia City, is included along with utility companies and state agencies.

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	long as each jurisdiction has participated in the process... Statewide plans will not be accepted as multi-jurisdictional plans.		
<b>PLANNING PROCESS</b>  (3-5)			
<b>Documentation of the Planning Process</b>  (3-6)	<b>Requirement §201.6(c)(1):</b> [The plan must document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.	Starting on Page 7 Appendix 2 – Page 2	<b>S</b> This plan highlights the planning process and how the public was engaged; a list of the LEPC members by organization is outlined in an appendix along with copies of meeting announcements, newspaper articles, and meeting sign-in sheets. The plan does a great job documenting the process, who participated and how the public was engaged.
<b>RISK ASSESSMENT</b>  (3-9)			
<b>Identifying Hazards</b>  (3-10)	<b>Requirement §201.6(c)(2)(i):</b> [The risk assessment shall include a] description of the type...of all natural hazards that can affect the jurisdiction...	Page 8	<b>S</b> A list of 13 hazard types that could affect Madison County is provided in the plan.
<b>Profiling Hazard Events</b>	<b>Requirement §201.6(c)(2)(i):</b> [The risk assessment shall	Starting on Page 11	<b>S</b> Each hazard specific section includes information on past events. They have done a great job in researching past events and research data is

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(3-14)	include a] description of the...location and extent of all natural hazards that can affect the jurisdiction. The plan shall include information on previous occurrences of hazard events and on the probability of future hazard events.		included in the appendixes. A review of the SHELDUS database at <a href="http://www.sheldus.org">www.sheldus.org</a> indicated the historical data on events provided in the plan are reasonably complete. It is recommended that SHELDUS be reviewed in future editions, since some valuable information on historic losses contained in SHELDUS could benefit this plan.
<b>Assessing Vulnerability: Overview (Currently found under Identifying Assets section, p.3-18—to be corrected in next version of the Plan Criteria)</b>	<b>Requirement 201.6(c)(2)(ii):</b>  [The risk assessment shall include a] description of the jurisdiction's vulnerability to the hazards described in paragraph (c)(2)(i) of this section. This description shall include an overall summary of each hazard and its impact on the community.	Starting on Page 11, Page 30	<b>S</b> An excellent vulnerability assessment section is provided for each of the 5 high priority hazards. The sections include a detailed description of hazard events and the impacts to the community. However the plan could be enhanced if the following data sources were referenced. The National Inventory of Dams at <a href="http://crunch.tec.army.mil/nid/webpages/nid.cfm">http://crunch.tec.army.mil/nid/webpages/nid.cfm</a> indicates that the South Meadow Creek Dam is a high hazard facility with no Emergency Action Plan. This information would enhance the discussion on Dams and Flooding in the plan. The Environmental Protection Agency website at <a href="http://www.epa.gov/tri/">http://www.epa.gov/tri/</a> indicates that a toxic release inventory site exists Columbia Paint and Coatings in Helena?? – 1517 Dodge Street – <b>this came up for Madison County, MT??</b> This would add to the extensive hazardous materials data provided in the plan document. National Bridge Inventory data at <a href="http://www.fhwa.dot.gov/bridge/nbi.htm">http://www.fhwa.dot.gov/bridge/nbi.htm</a> , for Madison County indicates two bridges on I-15 and one bridge on S-41 have critical sour potential.

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			This bridge information should be presented in the plan.
<b>Assessing Vulnerability: Identifying Assets</b>  (3-18)	<b>Requirement 201.6(c)(2)(ii)(A):</b> The plan should describe vulnerability in terms of: The types and numbers of existing and future buildings, infrastructure, and critical facilities located in the identified hazard areas...	Starting on Page 11, Appendix 2, Page 50	<b>N</b> The plan does a great job identifying hazard sensitive areas within the County by jurisdiction and by hazard type. Mapping of vulnerabilities is also included in the appendixes. The plan identifies all critical facilities found in the jurisdictions seeking plan approval. Types and the number of critical facilities are described for high priority hazards. However, in order to receive a satisfactory rating in this section, the plan would need to describe the types and number of buildings and infrastructure that may be built in the areas recommended for growth for future development. Development trends are discussed in the plan, but the plan would benefit from more details on specific locations for future development for each high priority hazard.  <i><b>Note: A less than "Satisfactory" score on this requirement will not preclude the plan from passing</b></i>



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<b>Assessing Vulnerability: Estimating Potential Losses</b>  (3-22)	<b>Requirement 201.6(c)(2)(ii)(B):</b> [The plan should describe vulnerability in terms of an] estimate of the potential dollar losses to vulnerable structures identified in paragraph (c)(2)(i)(A) of this section and a description of the methodology used to prepare the estimate...	Pages 43 - 48 and Page 15	<b>N</b> A detailed assets inventory with estimated structure/facility replacement values is provided in the plan, along with a table indicating vulnerable populations and other community facilities. In addition, this inventory identifies structures and facilities by jurisdiction. Also, potential dollar losses for earthquakes using FEMA calculation guidelines are included in the plan, and mapping of existing structure locations is also provided. To receive a satisfactory score on this section, the potential dollar losses for existing, as well as any planned future facilities in identified hazards areas need to be provided. FEMA 386-2 could be used to estimate the dollar value of the facilities exposed to the flood hazard, and HAZUS-MH provides estimates of the replacement value of the building stock and infrastructure in Madison County. These overall estimates could be used to develop dollar exposure to county-wide hazards.  <b><i>Note: A less than "Satisfactory" score on this requirement will not preclude the plan from passing.</i></b>
<b>Assessing Vulnerability: Analyzing Development Trends</b>  (3-24)	<b>Requirement 201.6(c)(2)(ii)(C):</b> [The plan should describe vulnerability in terms of] providing a general description of land uses and development trends within the community so	Page 42, Page 50, and Page 62	<b>S</b> Development trends are discussed in the plan. The plan indicates that Madison County is experiencing growth mostly in the Madison Valley and followed closely by Ruby Valley around Sheridan and Twin Bridges. Mitigation options will be considered in future land use decisions as Madison County

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	that mitigation options can be considered in future land use decisions.			review and approval of subdivision applications will be guided by the mitigation strategies of this plan.  <i>Note: A less than “Satisfactory” score on this requirement will not preclude the plan from passing.</i>
Multi-Jurisdictional Risk Assessment  (3-26)	Requirement §201.6(c)(2)(iii):  For multi-jurisdictional plans, the risk assessment section must assess each jurisdiction’s risks where they vary from the risks facing the entire planning area.	Pages 20, 24, 26, 27, 38	S	The plan does an outstanding job of discussing risk per high priority hazard by jurisdiction and how they vary from each jurisdiction and/or the county.
MITIGATION STRATEGY  (3-29)			<i>Note: Any changes made in the risk assessment to address previous unsatisfactory or needs improvement scores, will need to be reflected in the Mitigation Strategy section to gain final approval of the plan.</i>	
Local Hazard Mitigation Goals  (3-30)	Requirement §201.6(c)(3)(i):  [The hazard mitigation strategy shall include: a] description of mitigation goals to reduce or avoid long-term vulnerabilities to the identified hazards.	Starting on Page 51	S	The plan does a great job of providing seven general mitigation goals, along with objectives and actions that will reduce or avoid long-term vulnerabilities. Each goal is accompanied by its own measurable objectives and corresponding actions that support the objectives. Each action includes a time frame, funding and assigned staff for each action.
Identification and Analysis of Mitigation Measures	Requirement §201.6(c)(3)(ii):  [The mitigation strategy shall include a] section that identifies	Starting on Page 59	S	A broad range of mitigation projects are provided in a table titled Implementation Strategy for Projects in Madison County. The table lists several projects. In addition, the mitigation actions do a good job

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(3-34)	and analyzes a comprehensive range of specific mitigation actions and projects being considered to reduce the effects of each hazard, with particular emphasis on new and existing buildings and infrastructure.		addressing the vulnerabilities identified in the risk assessment. For example, many of the hazardous materials mitigation actions are supported by a sound analysis in the risk assessment.
<b>Implementation of Mitigation Measures</b>  (3-36)	<b>Requirement §201.6(c)(3)(iii):</b> [The mitigation strategy section shall include] an action plan describing how the actions identified in section (c)(3)(ii) will be prioritized, implemented, and administered by the local jurisdiction. Prioritization shall include a special emphasis on the extent to which benefits are maximized according to a cost benefit review of the proposed projects and their associated costs.	Starting on Page 59	<b>S</b> The mitigation strategy is clearly presented in the Implementation Strategy for Projects in Madison County Table. The plan also includes the prioritization of projects ranked as 1, 2, 3 or 4. The table presents project descriptions, the jurisdiction, responsible agency, potential funding sources, and event priority. The plan indicates that as funding opportunities become available, the mitigation projects can be prioritized with more detailed cost, benefits, and other necessary criteria. The plan would be enhanced if the process for ranking the projects 1, 2, 3, or 4 were explained. The plan would also be enhanced if a more detailed ranking were completed prior to plan submission along with a corresponding benefit cost review.
<b>Multi-jurisdictional Mitigation Strategy</b>  (3-40)	<b>Requirement §201.6(c)(3)(iv):</b> For multi-jurisdictional plans, there must be identifiable action items specific to the jurisdiction requesting FEMA approval or credit of the plan.	Starting on Page 59	<b>S</b> The plan implementation table does a good job of including a reference to the applicable jurisdictions for each mitigation project presented.

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<b>PLAN MAINTENANCE PROCEDURES</b>  (3-43)			
<b>Monitoring, Evaluating, and Updating the Plan</b>  (3-44)	<b>Requirement §201.6(c)(4)(i):</b> [The plan maintenance process shall include a section describing the] method and schedule of monitoring, evaluating, and updating the mitigation plan within a five-year cycle.	Page 62	<b>S</b> The LEPC is to review and update the plan annually at the January LEPC meeting. Once the plan is updated and finalized it will be submitted to the State Hazard Mitigation Officer. This exceeds FEMA's 5-year update requirement.
<b>Implementation Through Existing Programs</b>  (3-48)	<b>Requirement §201.6(c)(4)(ii):</b> [The plan shall include a] process by which local governments incorporate the requirements of the mitigation plan into other planning mechanisms such as comprehensive or capital improvement plans, when appropriate...	Page 62	<b>S</b> The plan indicates that hazard mitigation actions proposed for Madison County are intended to work in conjunction with existing County and Town Comprehensive Plans. County review and approval of subdivision applications will be guided by the mitigation strategies of this plan. The plan would be enhanced if mitigation action projects were incorporated into other plans such as town and county Capital Improvement Plans.
<b>Continued Public Involvement</b>  (3-50)	<b>Requirement §201.6(c)(4)(iii):</b> [The plan maintenance process shall include a] discussion on how the community will continue public participation in the plan maintenance process.	Page 62	<b>S</b> Annually, the normally scheduled January LEPC meeting date - a meeting open to the public - will take place regarding the plan. Copies of the plan will be available at public locations throughout the county. In addition, the public will be invited to submit comments to County Commissioners. Comments will be addressed by the LEPC at their

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			second meeting of the year.
<b>ADDITIONAL STATE REQUIREMENTS</b>	<i>States that have additional requirements can add them in the appropriate sections of the Plan Review Criteria or create a new section. States need then modify this worksheet to record the score for those requirements.</i>		
	Insert State Requirement (s)		